

GIACCHINO J. RUSSO and ASSOCIATES, P.C.
Attorneys at Law
35-28 Farrington Street
Flushing, N.Y. 11354
(718) 460-2847, fax (718) 460-4647
Email: Giacchino.russo@aol.com

April 9, 2021

Honorable Lewis J. Liman
Southern District of New York
United States Courthouse
500 Pearl Street
New York, N.Y. 1007

Re: United States v. Chaoyue Zhao, 20 Cr, 129

Your Honor:

As you are aware, I am the attorney for Chaoyue Zhao in the above referenced proceeding. I am writing to you to request an extension of the time within which to make pretrial motions in this case.

Since my client has arrived in New York, he has been in two different jails and, as of last week is in a hospital for medical treatment. Although, the U. S. attorney has been kind enough to offer to assist in locating Mr. Zhao, I am have not been informed as of today of his current location.

I have been able to have only 2 one -half hour telephone calls and one other short call with my client since his arrival in New York. The short call and one of the longer calls were prior to bail hearings and were substantially used for discussion of that subject. The second longer call followed the last bail hearing, but was also used primarily to explain the results of that hearing.

I was finally able to set up a jail visit last week, which in person visit was requested by my client, but then the hospitalization occurred.

Therefore, I am requesting, with the consent of the United States Attorney, for a 30 day extension of time within to submits a motion in this matter; specifically until May 16, 2021. Based upon my consultation with the United States Attorney, the parties also consent to an exclusion of time and extension of applicable statutory and Court deadlines until the date of a rescheduled hearing on any such motion.

Thank you for your consideration in this matter.

Sincerely yours,



Giacchino J. Russo, Esq

GJR/hq


Cc: Audrey Strauss, AUSA (by ECF), Stephanie lake, AUSA (by ECF)
Sheb Swett, AUSA (by ECF), Aline Flodr, AUSA (by ECF)

REQUEST GRANTED.

The time for defendant to submit pretrial motions is extended to May 17, 2021. Government response due by May 24, 2021. Motion Hearing set for May 27, 2021 at 12:00PM in Courtroom 15C at 500 Pearl Street Courthouse before Judge Lewis J. Liman. The Court, with consent of all parties, excludes time until May 27, 2021 under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interests of justice outweigh the interests of the public and the defendant in a speedy trial, in that the time between now and May 27 will allow additional time for defendant to consider and make any pretrial motions.

The Clerk of Court is respectfully directed to terminate motions at dkt. #16 and #17.

4/9/2021 SO ORDERED.



LEWIS J. LIMAN
United States District Judge